

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

LIBERTY PATENTS, LLC.,

Plaintiff,

v.

LENOVO GROUP LIMITED, ET AL.,

Defendants.

Case No. 2:20-cv-314-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

**JOINT MOTION TO STAY ALL DEADLINES PENDING SETTLEMENT
AS TO PANASONIC CORPORATION OF NORTH AMERICA**

Plaintiff Liberty Patents, LLC (“Liberty Patents”) and Defendant Panasonic Corporation of North America (“Panasonic”) hereby notify the Court that the parties have reached an agreement in principle, which would resolve all matters in controversy between them in the above-captioned action. Accordingly, Liberty Patents and Panasonic file this joint motion for a stay of all deadlines for forty-five (45) days, so that the parties can finalize their settlement agreement and appropriate dismissal papers may be submitted. Liberty Patents and Panasonic request this stay, not for purpose of delay, but that they might finalize and file dismissal papers without incurring additional expense.

Dated: January 21, 2021

Respectfully submitted,

/s/ Steven J. Routh

Steven J. Routh (D.C. Bar # 376068)

LEAD ATTORNEY

srouth@orrick.com

Sten A. Jensen (D.C. Bar # 443300)

sjensen@orrick.com

Christopher J. Siebens (D.C. Bar # 1031543)

csiebens@orrick.com

ORRICK, HERRINGTON & SUTCLIFFE LLP
Columbia Center 1152 15th Street, NW
Washington, DC 20005
Tel: (202) 339-8400
Fax: (202) 339-8500

**ATTORNEYS FOR DEFENDANT
PANASONIC CORPORATION OF NORTH
AMERICA**

/s/ Zachariah S. Harrington

Matthew J. Antonelli

Texas Bar No. 24068432

matt@ahtlawfirm.com

Zachariah S. Harrington

Texas Bar No. 24057886

zac@ahtlawfirm.com

Larry D. Thompson, Jr.

Texas Bar No. 24051428

larry@ahtlawfirm.com

Christopher Ryan Pinckney

Texas Bar No. 24067819

ryan@ahtlawfirm.com

Rehan M. Safiullah

Texas Bar No. 24066017

rehan@ahtlawfirm.com

ANTONELLI, HARRINGTON
& THOMPSON LLP

4306 Yoakum Blvd., Ste. 450

Houston, TX 77006

(713) 581-3000

Stafford Davis

State Bar No. 24054605

sdavis@stafforddavisfirm.com

Catherine Bartles

Texas Bar No. 24104849

cbartles@stafforddavisfirm.com

THE STAFFORD DAVIS FIRM

815 South Broadway Avenue

Tyler, Texas 75701

(903) 593-7000
(903) 705-7369 fax

**ATTORNEYS FOR PLAINTIFF LIBERTY
PATENTS, LLC**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Liberty Patents and counsel for Panasonic have complied with Local Rule CV-7(h) by conferring, and all parties agree to filing this as a joint motion.

/s/ Zachariah S. Harrington
Zachariah S. Harrington

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 21st day of January 2021, the above document was filed with the Clerk of Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Zachariah S. Harrington
Zachariah S. Harrington